

# Exhibit F



**U.S. Department of Justice**

Criminal Division

Public Integrity Section

Washington, D.C. 20530

September 27, 2022

**BY ELECTRONIC MAIL**

John J. Pease III, Esq.  
Jonathan York, Esq.  
Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103-2921

Re: *United States v. Julio R. Sotomayor*, 1:22-cr-00122 (RDA)

Dear Messrs. Pease and York:

The government's third discovery production has been loaded onto your external drive and is ready for pick up. The third production consists of three parts. The first part contains documents that are being reproduced to correct various issues that were identified by the government and defense counsel. Any documents with the same bates numbers as those previously produced are intended to replace the previously produced documents in their entirety. The second part contains documents that were provided to the government as pre-processed documents. The third part contains documents that the government has processed.

In response to your letters dated August 31, 2022 and September 14, 2022, and as a supplement to our September 2, 2022, e-mail response to your letter dated August 23, 2022, please be advised as follows:

1. The government's third discovery production includes, among other things, the subpoena returns for LLH & Associates, Thrive Technologies, Corporate Executive Services, and WTI (supplemental subpoena material). It also includes recordings associated with various individuals. The third discovery production does not include a supplemental subpoena return from Bank of America that is associated with your client and material produced by Mr. Arevalo and his companies pursuant to a subpoena. This material is currently being processed and will be included as part of a smaller fourth production. Please return your external hard drive to us after you have extracted the data on it.

2. As noted in your September 14, 2022 letter, the material produced by Web.com (the Internet Service Provider for your client's e-mail account) was submitted for filter review. The government's next production will include the post-filter material seized pursuant to the attachment for the search warrant. The unfiltered material provided by Web.com has been

segregated and maintained separately. A copy set of this material is available for your review. Please contact us at your convenience, and we will arrange for you to receive a copy set.

3. The material seized pursuant to the search warrants for the personal e-mail accounts for Ms. Sturgis and Ms. Winfield have been produced to you as part of the initial discovery productions and, again, as part of the third production. To the extent you are now requesting all the material provided by Microsoft and Oath Holdings (*i.e.*, the material not deemed responsive to the search warrant attachments for these e-mail accounts), please contact us to arrange to receive a copy set of this material (which we have segregated and maintained separately).

4. We have examined the nine additional documents that you indicated were not properly bates stamped, but rather have file names that appear to be bates numbers. The government will reproduce these documents as part of the fourth discovery production.

5. In our September 2, 2022 e-mail, we provided you with an update regarding the various issues identified in your August 23, 2022 letter. The recordings associated with various FBI documents identified in your letter are included in the third production. With respect to the place-holder files, FBI-00053598-53605, we informed you that there was an error in loading them into the database that we use to produce discovery. These files have been reproduced to you as part of the third discovery production. The government's third discovery production also includes BBG-00087795 to BBG-00087830 with the image overlay needed to load these files.

6. Based on your September 16, 2022 letter, it is our understanding that you have resolved the issue you were having with the PROD-BEGATTACH and PROD\_ENDATTCH fields. If our understanding is incorrect, please let us know.

Jessica D. Aber  
United States Attorney

Corey R. Amundson  
Chief, Public Integrity Section



---

Edward Sullivan  
Senior Litigation Counsel, Public Integrity Section  
Heidi B. Gesch  
Assistant United States Attorney